

1 DAVID L. ANDERSON (CABN 149604)
2 United States Attorney

3 HALLIE HOFFMAN (CABN 210020)
4 Chief, Criminal Division

5 LINA PENG (NYBN 5150332)
6 Assistant United States Attorney

7 450 Golden Gate Avenue, Box 36055
8 San Francisco, California 94102-3495
9 Telephone: (415) 436-7224
10 FAX: (415) 436-7027
11 Lina.Peng@usdoj.gov

12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 HAICHAO HUANG,

20 Defendant.

21) CASE NO. CR 19-110 SI

22) STIPULATION AND [PROPOSED] ORDER
23) CONTINUING STATUS CONFERENCE AND
24) EXCLUDING SPEEDY TRIAL TIME FROM
25) OCTOBER 11, 2019 TO NOVEMBER 8, 2019

26 The parties, through their counsel of record, stipulate as follows:

27 1. The parties in the above-captioned matter are scheduled to appear for a status conference
28 on October 11, 2019.

29 2. The government has produced thousands of pages of discovery in this case. Counsel for
30 the parties have conferred, and counsel for the defendant has informed the government
31 that he is continuing to review discovery. As a result, the parties agree that it is best to
32 continue the upcoming status conference until counsel for the defendant has had more of
33

1 an opportunity to review the discovery and discuss with his client. The parties are also
2 engaged in negotiations to resolve this case and believe more time would be productive.

3 3. As a result, the parties request that the status conference currently scheduled for October
4 11, 2019 be continued until November 8, 2019, which is the next date that works for both
5 parties and on which the Court is available.

6 4. The defendant continues to review the discovery that the government produced. In order
7 to allow for the effective preparation of counsel for the defendant, the parties agree that
8 time should be excluded under the Speedy Trial Act between October 11, 2019 and
9 November 8, 2019.

10 IT IS SO STIPULATED.

11
12
13 Dated: October 8, 2019

14 /s/
15 ROBERT CHEASTY
16 Attorney for Defendant Haichao Huang

17 Dated: October 8, 2019

18 /s/
19 LINA PENG
20 Assistant United States Attorney

(PROPOSED) ORDER

Based upon the representation of counsel and for good cause shown, the Court continues the status conference in this matter currently scheduled for October 11, 2019 until November 8, 2019. Furthermore, the Court finds that failing to exclude the time between October 11, 2019 and November 8, 2019, would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between October 11, 2019 and November 8, 2019 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, IT IS HEREBY ORDERED that the time between October 11, 2019 and November 8, 2019 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: October 9, 2019


HONORABLE SUSAN ILLSTON
United States District Judge